

JASON M. FRIERSON  
United States Attorney  
District of Nevada  
Nevada Bar Number 7709  
BIANCA R. PUCCI  
Nevada Bar Number 16129  
Assistant United States Attorney  
501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, Nevada 89101  
Phone: (702) 388-6336  
[bianca.pucci@usdoj.gov](mailto:bianca.pucci@usdoj.gov)  
*Attorneys for the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTIAN DEMARCO THOMAS,

Defendant.

Case No.: 2:22-cr-00129-GMN-DJA

**Stipulation to Extend Response  
Deadlines (First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen and Raquel Lazo, Assistant Federal Public Defenders, counsel for the defendant Christian Demarco Thomas, that the government's response to the objections to the report and recommendation deadline currently scheduled for September 20, 2023, and the defense response to the objections to the report and recommendation currently scheduled for September 21, 2023, both be extended to September 27, 2023. This Stipulation is entered into for the following reasons:

1. The government counsel was out of the country when the objections were filed in the instant case. Government counsel needs additional time to adequately respond to the objections raised in Thomas' filing.

2. Defense counsel will also benefit from the extension to allow counsel time to adequately respond to the government's objection.

3. The parties agree to the extension.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this stipulation is made in good faith and not for purpose of delay.

5. This is the first request for an extension of the response deadlines to the objections to the report and recommendation.

DATED this 19th day of September, 2023.

Respectfully submitted,

For the United States:

JASON M. FRIERSON  
United States Attorney

/s/ Bianca R. Pucci  
BIANCA R. PUCCI  
Assistant United States Attorneys

For the Defense:

RENE L. VALLADARES  
Federal Public Defender

/s/ Joy Chen  
JOY CHEN  
RAQUEL LAZO  
Assistant Federal Public Defenders  
Counsel for defendant Christian Demarco  
Thomas

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTIAN DEMARCO THOMAS,

Defendant.

2:22-cr-00129-GMN-DJA

**Order**

Based on the Stipulation of counsel, good cause appearing therefore, the Court finds that:

1. The government counsel was out of the country when the objections were filed in the instant case. Government counsel needs additional time to adequately respond to the objections raised in Thomas's filing.

2. Defense counsel will also benefit from the extension to allow counsel time to adequately respond to the government's objection.

3. The parties agree to the extension.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this stipulation is made in good faith and not for purpose of delay.

5. This is the first request for an extension of the response deadlines to the objections to the report and recommendation.

IT IS HEREBY ORDERED that the deadlines to file the responses to the objections to the report and recommendation currently scheduled on September 20 and 21, 2023, be vacated and continued to September 27, 2023.

DATED this 23 day of September, 2023.

  
HONORABLE JUDGE GLORIA M. NAVARRO